



Kraft Foods

Sheryl A. Marcouiller  
Senior Food and Drug Counsel

1052 '99 APR 29 P1:36

November 10, 1998

Loretta A. Carey  
Food Standards Branch (HFS-158)  
Division of Programs and Enforcement Policy  
Office of Food Labeling  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street, S.W.  
Washington, D.C. 20204

Re: Petition for Temporary Marketing Permit  
Salad Dressing

Dear Ms. Carey:

Thank you for calling to advise me that Kraft needs to file all of the labels related to our May 14th application for a temporary permit to market test salad dressing. You requested label copy for every size, brand, and slightly different formula of salad dressing we intend to market under the permit.

With my letter to you dated October 1, 1998, we provided color copies of the labels for one formula of each product we propose to market under the permit. Note that the labels previously provided reflect only lowering of the egg content by less than 1/2 %, as that is the particular change we seek to implement immediately. We provided labels for seven different sizes of Miracle Whip brand salad dressing sold at retail and labels for five sizes of the same product sold to foodservice institutions.<sup>1</sup> We also provided labels for two products which use the same formula as the Miracle Whip brand salad dressings, but are sold only to industry under the Salad Bowl brand.

When we provided the labels on October 1st, we failed to include labels for plastic bottles for the 40 oz and 48 oz sizes of Miracle Whip brand salad dressing. Color copies of these labels are enclosed. The label content is the same as for the glass jars, but the dimensions are slightly different.

<sup>1</sup> There are two labels for one size with different SKU numbers that are substantively identical.

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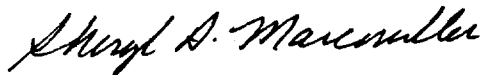
At this time, we are also submitting black and white label copy for an additional two formulas of each product. The first formula reflects reduction of egg yolk just as in the colored labels previously provided, but also reflects the addition of the safe and suitable preservatives potassium sorbate and phosphoric acid. The second formula reflects the addition of the safe and suitable preservatives potassium sorbate and phosphoric acid as well as the addition of the safe and suitable emulsifier polysorbate 60. The black and white label copy corresponds to the color copy for each product, except that we are not providing copy for the 40 oz and 48 oz glass jars as the conversion to plastic bottles will be completed by the time these formula are introduced.

We now amend our petition to withdraw the request to use the ingredients lactic acid and propylene glycol alginate, because we are not at this time submitting labels including those ingredients. When we intend to use those ingredients, we will request permission to do so from the Food and Drug Administration.

Additionally, we would like to request that our permit be in effect from January 1, 1998 through March 31, 2000. In fact, we would like permission to begin production of the revised formula as soon as possible, but we recognize that the agency needs time to consider the information we are now providing to complete the file.

Please do not hesitate to contact me at 847-646-4206, if you have any additional question. Thank you for your consideration.

Respectfully submitted,



Kraft Foods, Inc.  
Sheryl A. Marcouiller